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| 12 | | | |
| 13 | Attorneys for GOOGLE LLC | | |
| | UNITED STATES DISTRICT COURT | | |
| 14 | NORTHERN DISTRICT OF CALIFORNIA | | |
| 15 | SAN FRANCISCO DIVISION | | |
| 16 | SONOS, INC., | Case No. 3:20-cv-06754-WHA | |
| 17 | SONOS, INC., | Related to Case No. 3:21-cv-07559-WHA | |
| 18 | Plaintiff and Counter- | DECLARATION OF JOCELYN MA IN | |
| | Defendant, | SUPPORT OF GOOGLE LLC'S | |
| 19 | | ADMINISTRATIVE MOTION TO FILE UNDER SEAL PORTIONS OF ITS | |
| 20 | vs. | RESPONSE TO REQUEST FOR | |
| 21 | | INFORMATION (DKTS. 649, 661) | |
| 22 | GOOGLE LLC, | | |
| | Defendant and Counter- | | |
| 23 | Claimant. | | |
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CASE No. 3:20-cv-06754-WHA
DECLARATION OF JOCELYN MA

I, Jocelyn Ma, declare and state as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC ("Google") in this matter. I make this declaration in support of Google's Administrative Motion to File Under Seal Portions of its Response to Request for Information (Dkts. 649, 661) ("Response to Request for Information") ("Google's Administrative Motion"). If called as a witness, I could and would testify competently to the information contained herein.

2. Google's Administrative Motion seeks an order sealing the following materials:

| Document | Portions to Be Filed | Designating Party |
|---|--------------------------------|--------------------------|
| | Under Seal | |
| Response to Request for Information | Portions highlighted in yellow | Google |
| Exhibit 2 to the Declaration of Lindsay Cooper | Portions outlined in red boxes | Google |

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3. 1 In addition, the portions sought to be sealed contain confidential information regarding 2 Google's highly sensitive product usage metrics data which Google does not share publicly. Public 3 disclosure of this information could harm Google's competitive standing and create a risk of injury by providing competitors with access to information that Google does not have similar access to about 4 5 their competitors, and may allow competitors and/or bad actors to manipulate or gain insight into how 6 Google maintains its data. The portions sought to be sealed also implicate the third-party 7 confidentiality rights of IFTTT. Specifically, the Court has asked for non-public data in Google's 8 possession regarding IFTTT's revenue and usage. Google is producing this information in response to 9 the Court's Request for Information, but IFTTT has not consented to its production. Thus, Google has 10 good cause to keep such information under seal. A less restrictive alternative than sealing would not 11 be sufficient because the information sought to be sealed is Google's proprietary and confidential 12 business information but is integral to Google's Response to Request for Information. 13 I declare under penalty of perjury that to the best of my knowledge the foregoing is true and 14 correct. Executed on May 5, 2023, in San Francisco, California. 15 DATED: May 5, 2023 16 By: /s/ Jocelyn Ma Jocelyn Ma 17 18

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ATTESTATION I, Sean Pak, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Jocelyn Ma has concurred in the aforementioned filing. DATED: May 5, 2023 /s/ Sean Pak Sean Pak

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